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7 *dba Luxor Hotel & Casino, New Castle Corp.*  
8 *dba Excalibur Hotel & Casino, Circus Circus Casino Inc.*  
*dba Circus Circus Hotel & Casino*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 TRUSTEES OF THE NEVADA RESORT  
ASSOCIATION—INTERNATIONAL  
12 ALLIANCE OF THEATRICAL STAGE  
EMPLOYEES AND MOVING PICTURE  
13 MACHINE OPERATORS OF THE UNITED  
STATES AND CANADA, LOCAL 720,  
14 PENSION TRUST; TRUSTEES OF THE  
NEVADA RESORT 'ASSOCIATION  
15 INTERNATIONAL ALLIANCE OF  
THEATRICAL STAGE EMPLOYEES AND  
16 MOVING PICTURE MACHINE OPERATORS  
OF THE UNITED STATES AND CANADA,  
17 LOCAL 720, WAGE DISABILITY TRUST;  
and TRUSTEES OF THE NEVADA RESORT  
18 ASSOCIATION—INTERNATIONAL  
ALLIANCE OF THEATRICAL STAGE  
19 EMPLOYEES AND MOVING PICTURE  
MACHINE OPERATORS OF THE UNITED  
20 STATES AND CANADA, LOCAL 720,  
APPRENTICE AND JOURNEYMAN  
21 TRAINING AND EDUCATION TRUST,

22 Plaintiffs,

23 vs.

24 RAMPARTS, LLC dba Luxor Hotel & Casino, a  
Nevada limited liability company; NEW  
25 CASTLE CORP. dba Excalibur Hotel & Casino,  
a Nevada corporation; and CIRCUS CIRCUS  
26 CASINOS INC. d/b/a CIRCUS CIRCUS  
HOTEL & CASINO, a Nevada corporation,

27 Defendants.  
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**Case No.: 2:19-cv-01536-CDS-BNW**

**NOTICE OF SETTLEMENT AND  
STIPULATION AND ORDER TO  
STAY DEADLINES**

1 Plaintiffs, Trustees of The Nevada Resort Association—International Alliance of  
 2 Theatrical Stage Employees and Moving Picture Machine Operators of The United States And  
 3 Canada, Local 720, Pension Trust; Trustees of The Nevada Resort Association—International  
 4 Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of The United  
 5 States and Canada, Local 720, Wage Disability Trust; and Trustees of The Nevada Resort  
 6 Association—International Alliance of Theatrical Stage Employees and Moving Picture Machine  
 7 Operators of The United States and Canada, Local 720, Apprentice and Journeyman Training  
 8 and Education Trust (“Plaintiffs”), through their counsel The Urban Law Firm, and Defendants  
 9 Ramparts, LLC dba Luxor Hotel & Casino, New Castle Corp. dba Excalibur Hotel & Casino,<sup>1</sup>  
 10 Circus Circus Casinos Inc. dba Circus Circus Hotel & Resort,<sup>2</sup> (“Defendants”) through their  
 11 counsel Jackson Lewis P.C., hereby advise the Court that the parties mediated their dispute with  
 12 the Honorable Peggy Leen on July 22, 2022 and have agreed to a tentative resolution of this  
 13 matter.

14 Specifically, a settlement was reached in principal, but is still subject to ratification by the  
 15 Plaintiffs’ full Board of Trustees. The Board of Trustees will next meet in September of 2022.

16 The parties will file a stipulation and order to dismiss this action upon approval of the  
 17 settlement by the Plaintiffs’ Board of Trustees and execution of the formal agreements. Thus,  
 18 the parties request this Court schedule a settlement status check conference in approximately 60  
 19 days, at the Court’s convenience, to permit the parties time for ratification of the settlement,  
 20 completion of the settlement process, and to file a stipulation and order for dismissal.

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27 <sup>1</sup> Defendant New Castle, LLC, is incorrectly named “New Castle Corp.” in the Complaint.

28 <sup>2</sup> The Complaint incorrectly identifies Circus Circus Casinos, Inc. dba Circus Circus Hotel & Resort as  
 “dba Circus Circus Hotel & Casino.”

1 Given the prospective settlement of this matter, the parties also request that all other  
2 deadlines, including all discovery deadline currently pending, be stayed pending submission of  
3 the stipulation and order to dismiss this action.

4 Dated this 3rd day of August, 2022.

5 **THE URBAN LAW FIRM**

5 **JACKSON LEWIS P.C.**

6  
7 /s/ Michael A. Urban  
Michael A. Urban, NV SBN 3875  
8 **THE URBAN LAW FIRM**  
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9 Las Vegas, Nevada 89103  
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7 /s/ Lynne K. McChrystal  
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*Attorneys for Defendants*

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15 **ORDER**

16 IT IS SO ORDERED:

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United States District Judge

21 Dated: August 4, 2022  
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